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9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 REGINALD THOMAS,
16 Defendant.

CASE NO. 2:20-CR-012-MCE

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: May 14, 2020
TIME: 10:00 a.m.
COURT: Hon. Morrison C. England, Jr.

17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was set for status on March 17, 2020 in front of the
21 Honorable John A. Mendez and time was excluded through March 17, 2020. Docket 4.

22 2. By previous order, this matter was reassigned to the Honorable Morrison C. England, Jr.
23 and set for status on May 14, 2020. Docket 10.

24 3. By this stipulation, defendant now moves to exclude time between March 17, 2020, and
25 May 14, 2020, under Local Code T4.

26 4. The parties agree and stipulate, and request that the Court find the following:

27 a) The government has represented that the discovery associated with this case
28 includes numerous reports and related documents, photographs, audio recordings, and videos.

1 All of this discovery has been either produced directly to counsel and/or made available for
2 inspection and copying.

3 b) Counsel for defendant desires additional time to conduct investigation and
4 research related to the charges, review discovery for this matter, and to discuss potential
5 resolutions with his client.

6 c) Counsel for defendant believes that failure to grant the above-requested
7 continuance would deny him/her the reasonable time necessary for effective preparation, taking
8 into account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the
11 case as requested outweigh the interest of the public and the defendant in a trial within the
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
14 et seq., within which trial must commence, the time period of March 17, 2020 to May 14, 2020,
15 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
16 because it results from a continuance granted by the Court at defendant's request on the basis of
17 the Court's finding that the ends of justice served by taking such action outweigh the best interest
18 of the public and the defendant in a speedy trial.

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1 5. Nothing in this stipulation and order shall preclude a finding that other provisions of the
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
3 must commence.

4 IT IS SO STIPULATED.

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7 Dated: February 26, 2020

McGREGOR W. SCOTT
United States Attorney

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9 /s/ Tanya B. Syed
Tanya B. Syed
Assistant United States Attorney

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12 Dated: February 26, 2020

13 /s/ Olaf W. Hedberg
Olaf W. Hedberg
Counsel for Defendant
Reginald Thomas

14
15 **ORDER**

16 IT IS SO ORDERED.

17 Dated: March 2, 2020

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20 MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE